

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jacob Anthony Kromberg

Case No. 4:24-mj-30289
Judge: Ivy, Curtis
Filed: 07-25-2024

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

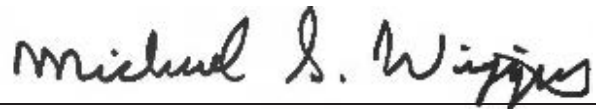
On or about the date(s) of February 2024 in the county of Shiawassee in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2422(b)	coercion and enticement of a minor
18 U.S.C. § 2252A(a)(2)	receipt of child pornography
18 U.S.C. § 2252A(a)(5)	possession of child pornography

This criminal complaint is based on these facts:

There is probable cause to believe that Jacob Anthony Kromberg committed violations of 18 U.S.C. § 2422(b) (coercion and enticement of a minor), 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), and 18 U.S.C. § 2252A(a)(5) (possession of child pornography).

☒ Continued on the attached sheet.



Complainant's signature

Michael Wiggins, Special Agent, FBI

Printed name and title



Judge's signature

Sworn to before me and signed in my presence and/or by
reliable electronic means.

Date: 7/25/2024

City and state: Bay City, MI

Honorable Patricia T. Morris, U.S Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANT

I, Michael S. Wiggins, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice (DOJ). I have been so employed since March 2004. I am currently assigned to the FBI's Detroit Division, Flint Resident Agency (FLRA) as the Coordinator and a member of the Northeast Michigan Trafficking and Exploitation Crimes Task Force (NEMTEC) which is a Federal Bureau of Investigation (FBI) managed task force. It is tasked with addressing Crimes Against Children and Human Trafficking threats in coordination and cooperation with its local and state partners. As part of my employment, I have received training in and been involved in investigations regarding human trafficking, exploitation of children, drug trafficking, money laundering, threats, financial crimes, crimes involving gang related activities, child pornography and other violations of federal law. I have been involved with several investigations regarding child pornography and the exploitation of children through the internet. I have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Jacob Anthony Kromberg for violations of 18 U.S.C. § 2422(b) (coercion and enticement of a minor), 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), and 18 U.S.C. § 2252A(a)(5) (possession of child pornography).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the requested complaint and arrest warrant.

4. In February 2024, a 14-year-old student athlete (hereinafter referred to as MV-1), reported to his coach that he was being solicited online for sexual activities via the social media application Snapchat. MV-1 reported that the suspect had traveled to his school sporting events and taken pictures of MV-1 partially undressed, later sending the pictures to the victim via Snapchat and asking to engage in oral sex with him for money. MV-1 reported the suspect used multiple Snapchat display names to conduct this solicitation.

5. As a default setting, Snapchat conversations and images are routinely deleted shortly after transmission. However, MV-1 took pictures and screenshot images of the conversation with the suspect. At one point, the victim took a screenshot of a partial facial image that the suspect sent to him during a snapchat conversation, which he believed to be the unknown suspect. This image was later circulated to coaches for awareness.

6. Several days later at a school sporting event, a coach had a face-to-face encounter with an individual he recognized as the suspect based on the image provided by MV-1. The coach followed the individual to the parking lot and observed him enter a white Ford Fusion sedan. The coach took a picture of the vehicle including its license plate using a cellphone, which was later provided to law enforcement.

7. State of Michigan vehicle registration searches confirmed the license plate for the above-referenced vehicle belonged to a 2020 Ford Fusion, registered to a 56-year-old man named with a home address located in Howell, Michigan. Also registered as living at this same address was a 26-year-old man, Jacob Kromberg, according to his Michigan driver's license record.

8. Continuing with the investigation, law enforcement took possession of

MV-1's cellular phone and reviewed the reported Snapchat messaging.

Investigators observed the suspect, using a Snapchat display name of "Max" (username "max.smi34"), had sent MV-1 messages such as "Do u want ur dick sucked. I'll give u money if u wany." MV-1 replied "No."

9. Legal orders were sent to Snapchat for account information relating to one of the suspect's Snapchat accounts (max.smi34). Snapchat returned records including account subscriber information, messages, and images stored within the account.

10. During the review of records provided by Snapchat, investigators learned the account contained two different usernames: max.smi34 and maxwil54. This is common, as Snapchat allows its users to change their usernames and display names without opening a new account. Although these usernames are the same account, investigators took note of the additional username maxwil54, which was determined to be the subject of a March 2024 cyber-tip complaint submitted to the National Center for Missing and Exploited Children (NCMEC) for a different online child enticement complaint using Snapchat. The victim complainant in that report lived in Missouri.

11. During the continued review of the max.smi34 account records,

investigators observed numerous images of adolescent and teenage male student athletes with their shirts off at various sporting events who appeared to be unaware that someone was taking their picture. Each of the boys appeared to be aged approximately 12-17 years old.

12. During further review of the max.smi34 account, investigators observed numerous conversations in which the max.smi34 user appeared to solicit and entice other Snapchat users, seemingly minors, into meeting for sexual encounters. A sample of these messages are listed below, each sent by max.smi34 to various Snapchat users on March 6, 2024:

“I go to kids wrestling meets to take pics of em shirtless”

“U know where I can find boys 11-13”

“I'm looking for young boys 11-16”

“I love to suck on teen boys”

“Can I suck ur young boy dick”

“I'll suck ur dick for money”

“Send pic of u if u want money”

“Added u to my collection of young teen boys”

13. Following is a conversation between max.smi34 and [redacted] user

dated March 6, 2024:

max.smi34: “Hi age”

redacted user: “14”

max.smi34: “U want ur young teen dick sucked”

redacted user: “No”

max.smi34: “Cmon lemme make u shoot warm cum”

14. During further review of the max.smi34 account, investigators observed what appears to be a collection of images and “selfies” from various adolescent and teenage males who sent images of themselves to the suspect over Snapchat, to include nude images of themselves fondling their penises. In one such image, a nude boy appearing to be approximately 15-17 years old is standing inside a shower touching his erect penis. This apparent minor also sent the suspect additional selfie-type images in which his erect penis is visible, thereby constituting federal child pornography as defined under 18 U.S.C. § 2256. Further, when investigators reviewed the messaging conversation between this user and max.smi34, they observed this user told max.smi34 that he is 16 years old. Following that statement, a prolonged thread of graphic conversation ensued including max.smi34 discussing money and asking to meet the minor for sex.

15. Further, Snapchat provided the IP addresses used by the suspect to connect to the internet when logged into the max.smi34 Snapchat account (an IP address is a unique numerical identifier assigned to a device accessing the internet). Investigators discovered some of these IP addresses were owned by Verizon. Legal orders were then sent to Verizon requesting subscriber information for the IP addresses used to create the Snapchat account max.smi34 and befriend MV-1 on Snapchat.

16. Investigators received records from Verizon and discovered that the cellular device assigned telephone number 810-852-**** was the only device that connected to both the IP address used on February 25, 2024 to create the max.smi34 Snapchat account and the IP address used on February 26, 2024 to befriend MV-1 on Snapchat. In essence, this information confirmed that the cellular device assigned telephone number 810-852-**** was the device used to create the suspect Snapchat account max.smi34 and subsequently befriend MV-1 on Snapchat.

17. Investigators conducted a TLO database search of this phone number, which is an investigative resource that allows subscribing law enforcement agencies to search public and proprietary data to assist with criminal

investigations. A search for telephone number 810-852-**** revealed it was associated with Jacob Kromberg, a resident of Howell, Michigan. Investigators observed that this was the same individual described above in Paragraph 7, who shares the same registered address as the suspect vehicle that was reported by a coach to be at a sporting event in March 2024.

18. Investigators reviewed the contents of the text messages stored within the Verizon account associated with phone number 810-852-**** and observed numerous text message conversations in which both the sender and the recipients of messages refer to the sender as “Jacob.” Investigators also observed several text messages received on a specific date in 2024, stating, “Happy Birthday.” One text read, “Good morning Jake! Happy Birthday. What time did you say you are coming home?” Investigators noted Jacob Kromberg was born on that date in 1998, as indicated by his Michigan driver’s license record.

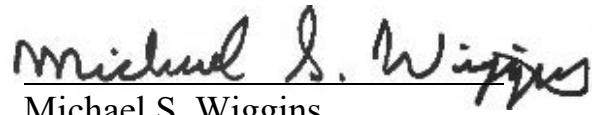
19. Investigators also observed media content in the search warrant return including an image of a training certificate in which the student’s name was “Jacob Kromberg,” dated May 31, 2024.

20. Investigators conducted basic internet searches for Jacob Kromberg and located a webpage from a high school in Washtenaw County, Michigan, in which he

was listed as the Boy's Freshman Soccer Coach for the Fall 2021-2022 Season. His contact phone number listed on the Coach's Bio webpage was 810-852-****.

21. On July 23, 2024, I obtained a federal search warrant authorizing, the search of the person of Jacob Kromberg, Kromberg's vehicle, and Kromberg's residence. This warrant was authorized by United States Magistrate Judge David Grand. The warrant was executed on July 24, 2024. Several items were seized pursuant to this warrant, including an external hard drive located in Kromberg's bedroom in the residence. I previewed this item and observed multiple images depicting child pornography in a subfolder with the following file path: "My Passport\Jacob HPBack-Up\Pictures\Snapchat." The pictures appeared to be images saved from the Snapchat social media application. For example, a file named "Snapchat-1987836525.jpg" depicted a male approximately 13 to 15 years old from the mid-thigh to the top of his abdomen. The subject of the photo was completely nude and his erect penis was clearly visible.

22. Based on the aforementioned facts, there is probable cause to believe that Jacob Anthony Kromberg committed violations of 18 U.S.C. § 2422(b) (coercion and enticement of a minor), 18 U.S.C. § 2252A(a)(2) (receipt of child pornography), and 18 U.S.C. § 2252A(a)(5) (possession of child pornography).


Michael S. Wiggins
Special Agent

Sworn to before me and signed in my presence
and/or by reliable electronic means on July 25, 2024.



Patricia T. Morris
United States Magistrate Judge